

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

WESTON CAPITAL ADVISORS, INC.,

Plaintiff,

-against-

PT BANK MUTIARA TBK,

Defendant.

No. 13-cv-6945 (PAC)

WESTON INTERNATIONAL ASSET  
RECOVERY CORPORATION INC.,

Plaintiff,

-against-

PT BANK MUTIARA TBK,

Defendant.

No. 14-cv-4469 (PAC)

**DECLARATION OF MARC L. GREENWALD**

I, Marc L. Greenwald, declare pursuant to 28 U.S.C. § 1746 as follows:

1. I am a partner of the law firm of Quinn Emanuel Urquhart & Sullivan, LLP, counsel for Defendant PT Bank Mutiara Tbk, and a member in good standing of the bar of New York and this Court. I respectfully submit this declaration in support of Bank Mutiara's motion to re-designate information produced by Plaintiffs Weston Capital Advisors, Inc. ("WCAI") and Weston International Asset Recovery Corporation Inc. ("WIARCI") (together with their affiliates, "Weston") and for Bank Mutiara's reasonable expenses, including attorneys' fees, for bringing the motion.<sup>1</sup>

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<sup>1</sup> Citations to the docket in *Weston Capital Advisors, Inc. v. PT Bank Mutiara, Tbk*, 13-cv-6945 (PAC) (the "WCAI Action") are noted as "WCAI Dkt.," and citations to the docket in (footnote continued)

2. On April 25, 2014, Bank Mutiara publicly released its 2013 Annual Report. Excerpts of the Annual Report, which is available in its entirety at [http://www.mutiarabank.co.id/admin/annual\\_report/Annual%20Report%202013.pdf](http://www.mutiarabank.co.id/admin/annual_report/Annual%20Report%202013.pdf), are attached as Exhibit A.

3. On June 27, 2014, J Trust Co. Ltd. publicly released its Annual Securities Report for the year ended March 31, 2014. Excerpts of the Annual Securities Report, which is available in its entirety at <https://www.jt-corp.co.jp/en/ir/pdf/ho/enq4-38.pdf>, are attached as Exhibit B.

4. On July 15, 2014, the Court heard oral argument on WIARCI's motion for a pre-judgment attachment and desire to move for summary judgment, on WCAI's request to modify this Court's March 19, 2014 contempt order, and on Bank Mutiara's request for further relief regarding Weston's ongoing failure to comply with the Court's orders. Excerpts of the transcript of that hearing, which is available in its entirety at WCAI Dkt. No. 86 and WIARCI Dkt. No. 26, are attached as Exhibit C.

5. On August 26, 2014, Charles Manuel emailed me, among others, regarding Weston's document production. A copy of that email is attached as Exhibit D.

6. On September 5, 2014, my law firm, on behalf of Bank Mutiara, reviewed Weston's proposed protective order, created a "blackline" document illustrating Bank Mutiara's edits to the same, and sent the same to Weston for its review. A copy of that redline is attached hereto as Exhibit E.

7. On December 12, 2014, my associate Daniel Koffmann visited Weston's website, <http://www.westonfinancial.com/>. Screenshots of pages on that website are attached as Exhibits F., G., and H.

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*Weston Int'l Asset Recovery Corp. Inc. v. PT Bank Mutiara Tbk*, 14-cv-4469 (PAC) (the "WIARCI Action") are noted as "WIARCI Dkt."

8. On August 27, 2014, Weston produced as P-00605 an October 31, 2013 statement for a U.S. Dollar-denominated bank account in the name of Weston International Capital Limited. A copy of this document is attached as Exhibit I. In light of Weston's designation of this document as "Confidential," this document has been filed under seal pursuant to Section 12 of the Stipulated Protective Order, WCAI Dkt. No. 89, WIARCI Dkt. No. 28.

9. On November 3, 2014, Weston produced as P-09016 a May 30, 2014 statement for a Mauritian Rupee-denominated bank account in the name of Weston International Capital Limited. A copy of this document is attached as Exhibit J. In light of Weston's designation of this document as "Confidential" and "Attorney Eyes' Only," this document has been filed under seal pursuant to Section 12 of the Stipulated Protective Order, WCAI Dkt. No. 89, WIARCI Dkt. No. 28.

10. On November 19, 2014, Weston produced as P-09179 a December 30, 2013 letter that John Liegey sent to Bank Mutiara on behalf of Weston International Asset Recovery Company Limited. A copy of this document is attached as Exhibit K. In light of Weston's designation of this document as "Confidential" and "Attorney Eyes' Only," this document has been filed under seal pursuant to Section 12 of the Stipulated Protective Order, WCAI Dkt. No. 89, WIARCI Dkt. No. 28.

11. On November 19, 2014, Weston produced as P-09173 an April 3, 2014 press release. A copy of this document is attached as Exhibit L. In light of Weston's designation of this document as "Confidential" and "Attorney Eyes' Only," this document has been filed under seal pursuant to Section 12 of the Stipulated Protective Order, WCAI Dkt. No. 89, WIARCI Dkt. No. 28.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York  
December 19, 2014

By: /s/ Marc L. Greenwald  
Marc L. Greenwald